DOCKET FILE COPY ORIGINAL

RECEIVED

SEP 16 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20054

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	DA 96-358

FURTHER REPLY COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.

David N. Porter
Vice President, Government Affairs
MFS Communications Company, Inc.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7709

Andrew D. Lipman
Mark P. Sievers
SWIDLER & BERLIN, CHARTERED
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500

Attorneys for
MFS COMMUNICATIONS
COMPANY, INC.

Dated: September 16, 1996

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20054

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	DA 96-358

FURTHER REPLY COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.

Table of Contents

SUMMARY

The reply comments submitted by MFS may be summarized as follows:

Allocating the Costs of Number Portability: The plain language of the Telecommunications Act of 1996 ("1996 Act") requires that "all telecommunications carriers" should bear the costs of number portability on a competitively neutral basis. This moots the claims that the Commission may exempt carriers from some level of financial responsibility for long-term number portability.

The cost allocation proposals made by some are designed to exempt a class of carriers. Proposals to allocate costs on the basis of number of lines, retail minutes, or number of queries must be rejected, since they serve to place an excessive burden on particular segments of the telecommunications industry, while leaving other segments with little or no responsibility to contribute equitably to number portability. MFS and others conclude that net revenues offer the optimal mechanism for allocating the costs of number portability.

Recovering the Costs of Number Portability: While MFS supports fully the Commission's proposals for recovery of common or shared costs, MFS urges the Commission to restrict recovery of direct carrier-specific costs. Permitting carriers to recover their individual costs from other carriers/competitors serves only to subsidize inefficiency, penalize new entrants, and frustrate efforts to allocate number portability costs in a competitively neutral manner.

For this reason, the Commission should prevent carriers from recovering any individual carrier-specific costs, reject arguments to treat carrier-specific costs as

exogenous for price cap purposes, and promulgate additional safeguards to stop carriers from using increased access or interconnection charges as a means of recovering costs.

The Application of Federal Principles: MFS agrees with the competitive neutrality principles proposed by the Commission in this proceeding, and urges the Commission to require every state that opts to develop its own database abide by the principles and rules developed in this docket. New entrants should not be forced to litigate number portability issues in every state.

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20054

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	DA 96-358

FURTHER REPLY COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.

MFS Communications Company, Inc. ("MFS"), by its undersigned counsel and pursuant to Section 1.415 of the Commission's Rules, submits these reply comments in response to the Commission's request for further comments on cost allocation and recovery issues in the above-captioned proceeding.[1] As noted in its initial comments filed on August 16, 1996, MFS strongly supports the Commission's recent efforts to promote consumer choice and increased competition in telecommunications markets. Number portability is an essential component in opening local telephone markets to competitive providers, and MFS believes the significant majority of the cost allocation and recovery proposals offered by the Commission in its *Further NPRM* will better encourage carriers to participate fully in the implementation of permanent number portability. However, MFS submits these reply comments in response to several arguments raised by commenters that would subvert the competitive goals of this proceeding and slow the effective implementation of long-term number portability.

---

[1] *Telephone Number Portability, First Report and Order and Further Notice of Proposed Rulemaking,* CC Docket No. 95-116, FCC 96-286 (rel. July 2, 1996) (*"Report and Order" or "Further NPRM"*).

I. ALLOCATING THE COSTS OF NUMBER PORTABILITY

A. The Telecommunications Act Makes Clear that "All Telecommunications Carriers" Should Contribute to the Implementation of Long-Term Number Portability

In the initial round of comments, MFS noted that section 251(e)(2) of the 1996 Act is unambiguous in requiring that the costs of number portability "shall be borne by *all* telecommunications carriers on a competitively neutral basis as determined by the Commission."[2] Other commenters joined MFS in reaching this conclusion.[3] As WinStar noted in its initial comments, section 251 divides the duties placed upon "each telecommunications carrier," each local exchange carrier," and "each incumbent local exchange carrier."[4] Moreover, as NYNEX highlighted, the Commission itself defined "telecommunications carrier" in the *Report and Order* to include all kinds of providers, other than aggregators, that offer telecommunications transmission services to the public for a fee.[5] Thus, MFS fails to see how section 251 provides the Commission with the authority to exempt categories of carriers from the responsibilities set forth in the section. Congress knew how to provide exemptions when it desired, and indeed it tiered the responsibilities of carriers accordingly.

---

2 47 U.S.C. § 251(e)(2) (1996) (*emphasis added*).

3 Comments of SBC Communications, Inc., at 5-6; Comments of Omnipoint, at 3; Comments of Bell Atlantic, at 1; Comments of Public Utilities Commission of Ohio, at 4; Comments of Ameritech, at 1; Comments of WinStar, at 3; Comments of NYNEX, at 5.

4 Comments of WinStar, at 4. *See also* 47 U.S.C. §§ 251(a), (b), and (c), respectively.

5 Comments of NYNEX, at 5. *See also Report and Order* at para. 8.

The Commission should not alter this carefully crafted statutory regime by following the suggestions of those few commenters who propose cost allocation schemes that would exempt classes of carriers from providing support for the implementation of number portability.[6] MFS asserts that such arguments contravene the clear statutory language of the 1996 Act, and ignore the fact that all carriers benefit from improvements in the telecommunications marketplace by virtue of long-term number portability. The Commission recognized these market-wide benefits in the *Further NPRM*, stating that "number portability will benefit all telecommunications carriers and users of services through increased competition."[7] Thus, both the statutory mandate and the unique market-wide benefits offered by number portability dictate that every carrier contribute financially to the implementation of number portability.

B. The Commission Should Adopt a Net Revenue Cost Allocation Mechanism to Ensure that All Carriers Are Responsible for the Costs of Implementing Number Portability

In its *Further NPRM,* the Commission proposed that the costs associated with the shared facilities used to provide number portability be allocated "[i]n proportion to each telecommunications carrier's total gross telecommunications revenues minus charges paid to other carriers."[8] The Commission declared that this methodology for cost recovery "[b]est comports with [its] principles for competitively neutral cost recovery . . ." *Id.* MFS concurs with the Commission and a number of commenters in concluding that the costs

---

6 See discussion in part I. B., *infra* for these cost allocation proposals.

7 *Further NPRM* at para. 213.

8 *Further NPRM* at para. 213.

of implementing long-term number portability should be apportioned in relation to net revenues.[9] Under such an allocation mechanism, the net service revenues of a local telephone carrier would be its total telecommunications service revenues, less its payments for interconnection charges, compensation charges, and charges for unbundled network elements. An interexchange company's share of number portability costs would be calculated on the basis of its revenues, net of the access charges it pays and also any charges it pays for the purchase and resale of long distance services. Allocating the costs of number portability through a carrier's net revenues, minus its carrier payments satisfies the mandate of competitively neutrality because it is borne by *all* carriers, based on their net revenues earned from sales to end user customers. Moreover, such a mechanism is consistent with how the Commission assesses common carrier regulatory fees and funds Telecommunications Relay Services.

MFS asserts that the alternative allocation proposals offered by commenters in fact serve to exempt certain groups of carriers from responsibility for the costs of number portability, and therefore they fail to satisfy the standards of competitive neutrality. Examples of these include allocation mechanisms that are based upon the number of lines maintained by a carrier,[10] the number of queries to the number portability database by a

---

[9] Comments of Frontier, at 4; Comments of Teleport Communications Group, at 4; Comments of WinStar, at 5; Comments of Nextel, at 3.

[10] Comments of SBC Communications, Inc., at 7.

carrier's customers,[11] the number of telephone numbers maintained by a carrier,[12] the quantity of "ported" numbers a carrier utilizes,[13] or only that portion of a carrier's revenues that are "related" to the imposition of number portability.[14] MFS argues that each of these proposals subverts the statutory mandate that "all telecommunications carriers" bear some level of responsibility for the implementation of number portability. One proponent of the per-line allocation mechanism admits just as much in its comments: "ILECs currently account for roughly two-thirds of the described [active lines], with interexchange carriers and CMRS providers accounting for the remainder."[15] Basing the allocation upon the number of telephone numbers a carrier has assigned to its customer will achieve the same result, while proposals to base the allocation upon a carrier's interaction with the number portability infrastructure (*e.g.*, per-query charges or the quantity of "ported" numbers used) in fact allow carriers to "free ride" on the market-wide competitive benefits that number portability introduces to the telecommunications industry. MFS therefore urges the Commission to adopt a net revenue cost allocation mechanism, since such a mechanism meets the standards of competitive neutrality and pays regard to the competitive benefits that number portability offers to the telecommunications industry as a whole.

---

11 Comments of Scherers Communications Group, Inc., at 2-3; Comments of Omnipoint Communications, Inc., at 3.

12 Comments of MCI, at 7; Comments of GSA, at 6.

13 Comments of Telecommunications Resellers Association, at 5.

14 Comments of Nextel, at 3-4.

15 Comments of SBC Communications, Inc., at 8.

II. Recovering the Costs of Long-Term Number Portability

A. Competitive Neutrality Requires That Only Common or Shared Costs of Implementation Should Be Recoverable

A competitively neutral standard requires that only the common or shared costs associate with number portability be recovered from all telecommunications carriers. The costs of upgrades to networks by individual carriers should be the sole responsibility of each individual telecommunications carrier. As MFS noted in its initial comments, just as every carrier must presently confront on its own the costs of compliance with the North American Numbering Plan, it is appropriate and efficient in this instance for each carriers to bear all of its own network costs associated with number portability. On the other hand, it would be inappropriate to give each carrier the opportunity to avoid the costs of its own behavior by allowing it to pass its costs on to competitors. Such a dynamic is the legacy of a regulated monopoly environment, which has no place in the newly competitive market prompted by the 1996 Act.

Allowing recovery of only common or shared industry costs does not create the same problematic incentives as carrier-specific costs, since no carrier will be able to undermine the creation and operation of shared facilities through poor technological choices or other inefficient behavior. Thus, common or shared costs will be generated in an efficient manner, and can rightfully be allocated among all telecommunications carriers for recovery.

In the *Further NPRM*, the Commission proposed that, among other things, a competitively neutral cost recovery mechanism "should not have a disparate effect on the

ability of competing service providers to earn a normal return."[16] Permitting recovery of direct carrier-specific costs, however, serves only to subsidize inefficiency and penalize competing new entrants who may have the flexibility and aptitude to maintain lower costs in the process of complying with the implementation of number portability. The Commission must reject the reasoning of commenters who claim that competitive neutrality requires that direct carrier-specific costs should be recoverable. For example, BellSouth notes that it could incur significant costs in meeting the requirement of long-term number portability.[17] Two other commenters lament that forcing carriers to bear the direct carrier-specific costs of complying with number portability requirements would amount to an unconstitutional taking.[18] However, as MFS has previously commented, an example from the auto industry helps to demonstrate the inherent problems of such arguments. When air bags were mandated by federal law, all auto manufacturers were required to change their production lines to comply with the new law. Individual manufacturers could not recover the costs of adjusting their assembly line from competitors, and just because it had some effect on the resources and internal operations of manufacturers, this law could not be considered an unconstitutional taking. MFS offers this analogy to demonstrate that there is nothing innovative about making firms bear their own costs for complying with a federal law, and MFS submits that it is sound economic policy to require carriers to bear all carrier-specific costs incurred in complying with the number portability mandate.

---

16 *Further NPRM* at para. 210.

17 Comments of BellSouth, at 6.

18 Comments of Cincinnati Bell at 6; Comments of GTE at 6.

B. The Commission Should Adopt Safeguards to Prevent Carriers From Passing Their Carrier-Specific Costs Along to Competitors

If the costs of number portability are to be assessed on a competitively neutral basis, the Commission should restrict carriers from passing their number portability costs to competitors. MFS strongly supports the adoption of policies that will prevent carriers from passing along direct or indirect carrier-specific costs on to competitors through service charges between carriers. In order to enforce the 1996 Act's requirements of competitive neutrality, carriers must be directed to recover their number portability costs from services sold to consumers -- not from services sold to competitor providers. US West and ITCs suggest, on the other hand, that the Commission should require the recovery of costs through a surcharge to all end-users, including other carriers.[19] Such a proposal, however, violates the principles of competitive neutrality, because carriers should not be allowed to pass costs along to competitors by any means. As noted above, carriers will not internalize those costs associated with inefficiency or delay if they can simply transfer those costs to competitors. MFS agrees with the comments of WinStar in this regard: "Such a transaction would not only foil the competitively neutral goals of this proceeding, but also subvert the Commission's efforts in other proceedings to ensure that access charges and the like are cost-based in nature."[20] While a carrier should have the flexibility to pass its costs on to its customers or absorb those costs itself, the Commission should promulgate and enforce absolute prohibitions on the ability of carriers to use carrier-to-carrier payments for the

---

19 Comments of US West, at 14; Comments of ITCs, at 3.

20 Comments of WinStar, at 8.

transfer of any carrier-specific costs associated with number portability.

By the same reasoning, MFS requests that the Commission prohibit price cap-regulated carriers from treating individual number portability costs as exogenous costs. If the Commission were to forbid carriers from recovering any carrier-specific costs, as MFS and others request, a policy permitting exogenous treatment of such costs would allow price cap incumbents to again pass these costs along to competitors, who will be unable to engage in the same practice. Similarly, MFS agrees with the analysis of MCI on exogenous treatment, concurring in the opinion that exogenous treatment of any carrier-specific costs "is not appropriate because [long-term number portability] costs are not being recovered through existing rates."[21] As MCI points out, exogenous treatment provides incumbents with an unfair advantage by allowing them to increase rates to recover these costs. MFS therefore urges the Commission to prevent carriers from treating any carrier-specific cost as exogenous for price cap regulation purposes.

III. States Choosing to Establish a Statewide Database Plan Must Follow the Federal Principles Adopted By the Commission in this Proceeding

In the *Further NPRM*, the Commission proposed that any cost recovery mechanism it implements should be governed by two principles: "(1) a competitively neutral cost recovery mechanism should not give one service provider an appreciable, incremental cost advantage over another service provider, when competing for a specific subscriber; and 2) a competitively neutral cost recovery mechanism should not have a disparate effect on

---

[21] Comments of MCI, at 12.

the ability of competing service providers to earn a normal return."[22] In addition, the Commission proposed to require that states opting to develop their own statewide number portability database, rather than participating in a regional database, should abide by the principles and rules developed in this proceeding. *Id.* at para. 211. MFS joins the significant majority of commenters in agreeing that the two federal principles proposed by the Commission are useful in implementating long-term number portability,[23] and further urges the Commission to require all states choosing to implement their own databases to abide by the principles and rules developed in this docket.

While NYNEX and BellSouth claimed that the principles set forth by the Commission in the *Further NPRM* do not adequately address the danger of end users switching service providers because of artificial regulatory incentives,[24] MFS believes that the Commission's principles respond to these concerns properly. Indeed, MFS argues that alteration of these principles to address the switching of providers by end users may in fact preserve the status quo and insulate incumbents from competitors attempting to erode their customer base. MFS suggests that the principles as constituted do not promote the creation of artificial incentives by themselves, but rather they allow new entrants to compete for customers on the merits of their services, rates, and technological innovations.

---

22 *Further NPRM* at para. 210.

23 Comments of Sprint, at 4; Comments of MCI, at 2; Comments of Ameritech, at 4; Comments of PCIA, at 4-5; Comments of Public Utilities Commission of Ohio, at 5; Comments of Illinois Commerce Commission, at 4; Comments of Association for Local Telecommunications Services, at 3; Joint Comments of Colorado Public Utilities Commission Staff and Colorado Office of Consumer Counsel, at 5-6; Comments of Florida Public Service Commission, at 2; Comments of Teleport Communications Group Inc., at 3; Comments of Time Warner Communications Holdings, Inc., at 6; Comments of People of the State of California and Public Utilities Commission of California, at 4.

24 Comments of NYNEX, at 10; Comments of BellSouth, at 4.

The Commission must also ensure that these principles -- and the cost allocation and recovery rules or guidelines promulgated according to these principles -- apply to states that choose to establish separate number portability databases. Without governing federal principles, new entrants may be forced to litigate number portability funding in each state, thereby deterring such competitors from undertaking the effort to enter a market in the first place. Moreover, if the Commission should adopt MFS' proposals to limit recovery to common or shared costs and prohibit recovery of carrier-specific costs, the common costs to be recovered in intrastate jurisdictions is likely to be *de minimis* and therefore state regulators may have little, if any, costs for which they must develop a cost recovery mechanism.

Conclusion

For the foregoing reasons, MFS respectfully requests that the Commission adopt rules consistent with principles discussed herein.

Respectfully submitted,

Andrew D. Lipman
Mark P. Sievers
Swidler & Berlin, Chtd.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500 (Tel)
(202) 424-7643 (Fax)

Attorneys for
MFS Communications Company, Inc.

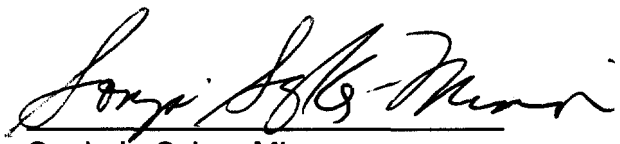
David N. Porter
Vice President, Government Affairs
MFS Communications Company, Inc.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7709

Dated: September 16, 1996

169467.1

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September 1996, copies of the FURTHER REPLY COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.; CC Docket No. 95-116, DA 96-358, were served via Hand Delivery* or First Class Mail, U.S. postage prepaid, to all parties on the attached service list.



Sonja L. Sykes-Minor

145567.1

William F. Caton*
Secretary
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Policy and Program Planning Division*
Common Carrier Bureau
Room 544
1919 M Street, N.W.
Washington, D.C. 20554

ITS, Inc. *
Room 246
1919 M Street, N.W.
Washington, D.C. 20554

Betsy L. Anderson
Duane K. Thompson
Attorneys for BELL ATLANTIC
1320 N. Court House Road
Arlington, VA 22201

Lisa M. Zaina
General Counsel
OPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20039

John Malloy, Esq.
Vice President and General Counsel
GO COMMUNICATIONS CORPORATION
201 North Union Street, Suite 410
Alexandria, VA 22314

Robert C. Schoonmaker
Vice President
GVNW INC./MANAGEMENT
2270 La Montana Way
Colorado Springs, CO 80918

David C. Jatlow
Young & Jatlow
Attorneys for THE ERICSSON CORPORATION
2300 N Street, N.W.
Suite 600
Washington, D.C. 20037

James R. Hobson
Donelan, Cleary, Wood & Master, P.C.
Attorneys for NATIONAL EMERGENCY NUMBER ASS'N
1100 New York Avenue, N.W., Suite 750
Washington, D.C. 20005-3934

R. Michael Senkowski
Jeffrey S. Linder
Stephen J. Rosen
Wiley, Rein & Fielding
Attorneys for PERSONAL COMMUNICATIONS INDUSTRY ASS'N
1776 K Street, N.W.
Washington, D.C. 20006

Richard A. Askoff
Attorney for NATIONAL EXCHANGE CARRIER ASS'N, INC.
100 S. Jefferson Road
Whippany, NJ 07981

Catherine R. Sloan/Richard L. Fruchterman/
Richard S.Whitt
Attorneys for WORLDCOM, INC.
d/b/a LDDS WORLDCOM
1120 Connecticut Ave., N.W., Suite 400
Washington, D.C. 20036

Richard J. Metzger
General Counsel
ASS'N FOR LOCAL TELECOMMUNICATIONS SERVICES
1200 19th Street, N.W.
Suite 560
Washington, D.C. 20036

Ellen S. Deutsch
Associate General Counsel
Citizens Utilities Company
of California
1035 Placer Street
Redding, CA 96001

Victoria A. Schlesinger, Esq.
TELEMATION INTERNATIONAL, INC.
6707 Democracy Blvd.
Bethesda, MD 20817

Ann E. Henkener
Assistant Attorney General
Public Utilities Section
Office of the Attorney General of Ohio
30 East Broad Street
Columbus, OH 43215-3428

Emily C. Hewitt
General Counsel
GENERAL SERVICES ADMINISTRATION
18th & F Streets, N.W.
Room 4002
Washington, D.C. 20405

Michael Altschul
Vice President and General Counsel
CELLULAR TELECOMMUNICATIONS INDUSTRY ASS'N
1250 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20036

William Barfield
Jim Llewellyn
BELLSOUTH CORPORATION
Suite 1800
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

Dan L. Poole
Jeffrey S. Bork
Attorneys for US WEST, INC.
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

Jere W. Glover, Esq.
Chief Counsel
Office of Advocacy
UNITED STATES SMALL BUSINESS ADMINISTRATION
409 Third Street, S.W. , Suite 7800
Washington, D.C. 20416

Gordon F. Scherer
President and Chief Executive Officer
SCHERERS COMMUNICATIONS GROUP, INC.
575 Scherers Court
Worthington, OH 43085

Richard A. Muscat
Assistant Attorney General
STATE OF TEXAS
P.O. Box 12548, Capitol Station
Austin, TX 78711-2548

Margot Smiley Humphrey
Koteen & Naftalin
Attorney for TDS TELECOM
1150 Connecticut Avenue, N.W., Suite 1000
Washington, D.C. 20036

Mark C. Rosenblum/John J. Langhauser
Clifford K. Williams
AT&T CORP.
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

J. Manning Lee
Vice President, Regulatory Affairs
Attorney for TELEPORT COMMUNICATIONS GROUP, INC.
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Glenn S. Richards
Fisher Wayland Cooper Leader & Zaragoza L.L.P.
Attorney for TELESERVICES INDUSTRY ASS'N
2001 Pennsylvania Avenue, N.W., Suite 400
Washington, D.C. 20006

William L. Roughton, Jr.
Attorney for PCS PRIMECO, L.P.
1133 20th Street, N.W.
Suite 850
Washington, D.C. 20036

Larry A. Peck
Frank Michael Panek
AMERITECH
Room 4H86
2000 West Ameritech Center Dr.
Hoffman Estates, IL 60196-1025

David Cosson
Marie Guillory
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Mary McDermott
Linda Kent
Charles D. Cosson
U.S. TELEPHONE ASS'N
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
NEXTEL COMMUNICATIONS, INC.
800 Connecticut Ave., N.W.
Suite 1001
Washington, D.C. 20006

Jay C. Keithley
Norina T. Moy
Kent Y. Nakamura
SPRINT CORPORATION
1850 M St., N.W., Ste. 1110
Washington, D.C. 20036

Harold L. Stoller
Richard S. Wolters
Special Assistants Attorney General
Counsel for ILLINOIS COMMERCE COMMISSION
527 East Capitol Ave.
P.O. Box 19280
Springfield, IL 62794-9280

Lucie M. Mates
Theresa L. Cabral
Sarah Rubenstein
PACIFIC BELL
140 New Montgomery Street
Room 1526
San Francisco, CA 94105

Albert Halprin
Melanie Haratunian
Halprin, Temple, Goodman & Sugrue
Attorneys for YELLOW PAGES PUBLISHERS ASS'N
1100 New York Avenue, N.W., Suite 650, East Tower
Washington, D.C. 20005

Mark Stachiw
AIRTOUCH PAGING
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, TX 75251

Carl W. Northrop
Bryan Cave LLP
Attorney for AIRTOUCH PAGING/ARCH COMMUNICATIONS GROUP
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005

John T. Scott, III
Crowell & Moring
Attorney for BELL ATLANTIC NYNEX MOBILE, INC.
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2595

Paul Glist/Christopher Savage/John C. Dodge
Cole, Raywid & Braverman
Attorneys for JONES INTERCABLE, INC.
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006

Brian Conboy/Sue Blumenfeld/Thomas Jones
Willkie, Farr & Gallagher
Attorneys for TIME WARNER
COMMUNICATIONS HOLDINGS, INC.
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

Joel Levy
Cohn and Marks
Attorneys for the National Wireless Resellers
Ass'n
1333 New Hampshire Ave., N.W.
Washington, D.C. 20036

Werner K. Hartenberger
Dow, Lohnes & Albertson
Attorney for
THE AD HOC COALITION OF COMPETITIVE
CARRIERS
1255 23rd Street, N.W., Suite 500
Washington, D.C. 20037

David J. Gudino
GTE SERVICE CORPORATION
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Daniel L. Brenner
Counsel for NATIONAL CABLE TELEVISION
ASS'N, INC.
1724 Massachusetts Ave., N.W.
Washington, D.C. 20036

Maureen Thompson
NYNEX TELEPHONE COMPANIES
1095 Avenue of the Americas
New York, NY 10036

Ellen S. LeVine
Attorney for
THE PEOPLE OF THE STATE OF CALIFORNIA
AND THE CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102

Charles C. Hunter
Hunter & Mow, P.C.
Attorney for
TELECOMMUNICATIONS RESELLERS ASS'N
1620 I Street, N.W., Suite 701
Washington, D.C. 20006

Paul Rodgers
General Counsel
NARUC
1102 ICC Building
P.O. Box 684
Washington, D.C. 20044

David L. Kahn
c/o Bellatrix International
4055 Wilshire Blvd., Suite 415
Los Angeles, CA 90010

Robert M. Lynch
SBC COMMUNICATIONS INC.
175 E. Houston, Room 1262
San Antonio, TX 78205

Alan J. Gardner
CALIFORNIA CABLE TELEVISION ASS'N
4341 Piedmont Avenue
Oakland, CA 94611

Stephen Kraskin
Kraskin & Lesse
Attorney for U.S. INTELCO NETWORKS, INC.
2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Judith St. Ledger-Roty
Reed Smith Shaw & McClay
Attorneys for PAGING NETWORK, INC.
One Franklin Square
Suite 1100 East Tower
Washington, D.C. 20005

Danny Adams
Wiley, Rein & Fielding
Attorneys for
COMPETITIVE TELECOMMUNICATIONS ASS'N
1776 K Street, N.W.
Washington, D.C. 20006

Jeffrey Olson, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison
Attorney for U.S. AIRWAVES, INC.
1615 L Street, N.W., Suite 1300
Washington, D.C. 20036

Mark O'Connor
Piper & Marbury
Attorney for OMNIPOINT CORPORATION
1200 19th Street, N.W.
Seventh Floor
Washington, D.C. 20036

Loretta Garcia
Donald Elardo
MCI TELECOMMUNICATIONS, INC.
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Edwin N. Lavergne
Ginsburg, Feldman and Bress, Chartered
Attorney for INTERACTIVE SERVICES ASS'N
1250 Connecticut Ave., N.W.
Washington, D.C. 20036

Roger W. Steiner
Assistant General Counsel
MISSOURI PUBLIC SERVICE COMMISSION
P.O. Box 360
Jefferson City, MO 65102

Richard F. Nelson
911 System Support Dept.
MARION COUNTY BOARD OF COUNTY COMMISSIONERS
2631 S.E. 3rd STreet
Ocala, FL 34471-9101

Bruce Hagen
Susan E. Wefald
Leo M. Reinbold
NORTH DAKOTA PUBLIC SERVICE COMMISSION
600 E. Boulevard
Bismarck, ND 58505-0480

Robert M. Gurss
Wilkes, Artis, Hedrick & Lane, Chartered
Attorney for ASSOCIATION OF PUBLIC SAFETY COMMUNICATIONS OFFICIALS INTERNATIONAL, INC.
1666 K Street, N.W., #1100
Washington, D.C. 20006

Mary E. Burgess
Staff Counsel
NEW YORK STATE DEPARTMENT OF PUBLIC SERVICE
Three Empire State Plaza
Albany, NY 12223-1350

Thomas Taylor
Frost & Jacobs
Attorneys for CINCINNATI BELL
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

Pat Wood, III, Chairman
Robert W. Gee, Commissioner
Judy Walsh, Commissioner
PUBLIC UTILITY COMMISSION OF TEXAS
7800 Shoal Creek Blvd.
Austin, TX 78757

Cynthia B. Miller
Associate General Counsel
FLORIDA PUBLIC SERVICE COMMISSION
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Denny Byrne
INDUSTRY NUMBERING COMMITTEE
1401 H Street, N.W., Suite 600
Washington, D.C. 20005-2190